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PRIVATE LIMITED
10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION
14

15 THOMAS WEISEL PARTNERS LLC, a
Delaware limited liability company, and
16 THOMAS WEISEL INTERNATIONAL
PRIVATE LIMITED, an Indian company,
17

18 Plaintiffs,

19 v.

20 BNP PARIBAS, a French corporation, BNP
PARIBAS SECURITIES (ASIA) LIMITED,
21 a Hong Kong company, and PRAVEEN
CHAKRAVARTY, an individual,
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23 Defendants.
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No. C-07-06198 MHP

Action Filed: December 6, 2007

MOTION FOR ADMINISTRATIVE
RELIEF (1) TO FILE A
CONSOLIDATED OPPOSITION TO
DEFENDANTS BNP PARIBAS AND
BNP PARIBAS SECURITIES (ASIA)
LTD'S AND DEFENDANT PRAVEEN
CHAKRAVARTY'S MOTIONS TO
DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT AND (2) TO
EXCEED NORMAL PAGE LIMITS FOR
AN OPPOSITION BRIEF;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT
THEREOF

Place: Courtroom 15
Judge: Hon Marilyn Hall Patel

MOTION FOR ADMINISTRATIVE RELIEF

Defendants BNP Paribas and BNP Paribas Securities (Asia) Limited (the “BNP Paribas Defendants”), on the one hand, and Defendant Praveen Chakravarty, on the other, have brought two broadly similar motions to dismiss for lack of personal jurisdiction and forum non conveniens. Pursuant to Civil Local Rule 7.11, Plaintiffs Thomas Weisel Partners LLC (“TWP LLC”) and Thomas Weisel International Private Limited (“TWIPL”) hereby move for an order permitting them to respond to those two motions in a consolidated opposition brief of no more than 40 pages, in lieu of filing two 25-page briefs, one in opposition to each motion. Defendants have stipulated that they have no objection to Plaintiffs proceeding in this fashion and will not oppose the present motion.

MEMORANDUM OF POINTS AND AUTHORITIES

The BNP Paribas Defendants and Defendant Chakravarty each have filed separate motions to dismiss Plaintiffs’ claims for lack of personal jurisdiction and forum non conveniens. Both motions speak to the same underlying facts, and there is considerable overlap in the arguments.

Responding to Defendants’ two jurisdictional motions separately would require Plaintiffs to discuss, and the Court to read, many of the same background facts and legal principles twice. Plaintiffs believe it would be more efficient for the parties and the Court if Plaintiffs filed a consolidated opposition to both jurisdictional motions.

Pursuant to Civil Local Rule 7.4(b), opposition papers may not exceed 25 pages “unless the Court orders otherwise pursuant to a party’s request made prior to the due date.” Here, Plaintiffs respectfully request the Court allow them to file a consolidated opposition brief of no more than 40 pages, rather than 25. The reason is that Plaintiffs are responding to two separate motions in one opposition. If Plaintiffs were filing separate oppositions to Defendants’ two jurisdictional motions, they would have 50 pages in which to discuss the relevant facts and law. Because of the economies of discussing shared facts and law only once, Plaintiffs can make their case in no more than 40 pages. Plaintiffs believe, however,

that having substantially fewer than 40 pages to oppose Defendants' two motions could prejudice their ability to respond adequately to the arguments Defendants have raised. Counsel for Plaintiffs have discussed these concerns with counsel for Defendants. Declaration of Michael L. Gallo In Support of Motion For Administrative Relief ¶9. Defendants have stipulated that they have no objection to the page limits proposed by Plaintiffs here and will not oppose the present motion. Stipulation Re Consolidated Opposition ¶5.

CONCLUSION

For the reasons described above, the Court should grant Plaintiffs’ request to file a single, consolidated opposition—of no more than 40 pages—to Defendants’ two jurisdictional motions.

DATED: June 18, 2008.

Respectfully,

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By: _____ /s/
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